

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION

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*

Plaintiff

and

*

KATHY C. KOCH

*

Intervenor/Plaintiff

*

v.

Civil No. S-02-CV-648

*

LA WEIGHT LOSS

*

Defendant

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AFFIDAVIT OF PAMELA J. WHITE

I, Pamela J. White, being over the age of 18 and competent to testify, state as follows:

1. I am a principal and shareholder with the law firm of Ober, Kaler, Grimes & Shriver, A Professional Corporation (“Ober|Kaler”), headquartered at 120 East Baltimore Street, Baltimore, Maryland 21202. I have been employed by the firm since 1976. I graduated from Washington and Lee University School of Law in 1977.

2. I was admitted to practice law in Maryland in 1977. I have engaged primarily in “employment law” practice since the 1980s and have chaired the Ober|Kaler Employment Law Group since 1993. I have represented and counseled hundreds of employer and employee clients over the years; tried dozens of cases to verdict or other evidentiary proceedings; handled several dozen employment disputes in arbitration, either as an advocate or as the arbitrator, since the mid 1990’s; served on relevant substantive law committees at the bar; served frequently as MICPEL or other CLE program faculty in relevant courses; served as an officer of the WBA (President

1989-90); served as an officer of the MSBA (President 2001-2002); served for a dozen years on the Select Committee on Gender Equality. Attached to this affidavit, as Exhibit A is my curriculum vitae, with listed publications in recent years; the c.v. accurately describes the nature of my employment law practice, among other things.

3. I have been representing Kathy C. Koch with respect to her claims of retaliation against LA Weight Loss since March 1998.

4. Efforts to resolve discovery disputes perpetuated by LA Weight Loss began at the time Defendant's counsel first offered its discovery responses in the Spring of 2003.

5. In 2003, my customary hourly billing rate was \$325.00; for the period of January 2004 until present my customary hourly billing rate is \$335.00.

6. Other attorneys assisted in this case, as needed. Carla Bailey, a junior associate in the Employment Group and Litigation Department, has provided substantial research, drafting and assistance throughout the discovery disputes. Her successive and customary hourly billing rates at the times she assisted in this matter were \$170.00 and \$195.00.

7. Each timekeeper recorded her time on daily time logs, which reflect the identity of each timekeeper, the nature of the work performed and the amount of time expended. I supervise all associates' work, oversee billing activity on this matter, and reviewed and analyzed the timekeeper reports to prepare periodic invoices (monthly) to Ms. Koch for payment. I routinely follow Maryland 1.5 of the Rules of Professional Conduct to prepare her invoices.

8. Attached to this Affidavit as Exhibit B is a compilation of recorded attorney time and activities, as that time was invoiced to Ms. Koch after "write-offs" prompted by my consideration of Rule 1.5. The descriptions of activities may have been redacted in an effort to protect privileged communications with Ms. Koch. In addition, the Exhibit does not include

time spent preparing for and conducting depositions, despite the fact that such time increased significantly due to Defendant's insufficient and non-responsive discovery responses, and/or expenses of transcripts.

9. The discovery disputes have had a dramatic impact on attorneys' fees billed to Ms. Koch and as reported to Defendant's counsel, quarterly, pursuant to the Local Rules (Appendix B). Total fees incurred are reflected in Ms. Koch's Quarterly Fee Statements as follows: Second Quarter 2003 \$7,809.54; Third Quarter 2003 \$21,913.27; and Fourth Quarter 2003 \$30,268.00. For the First Quarter 2004, I expect to report approximately \$16,500 in fees and expense incurred.

10. I have reviewed and assisted Carla Bailey in the preparation of Kathy Koch's Statement of Costs and Attorneys' Fees with its summary of attorney time and activities reasonably undertaken during this discovery dispute. I also have reviewed Exhibit B and it accurately reflects reasonable time, activities and fees incurred in the discovery disputes leading up to and including the filing of the motion to compel, reply and receipt of Judge Grimm's decision. The summary does not list expenses or costs, or fees incurred to prepare the Statement of Costs and Attorneys' Fees.

11. In light of the foregoing, on behalf of Kathy C. Koch, I request that \$22,822.00 be awarded to Ms. Koch in reasonable attorneys' fees as described in the Statement and Exhibit B attached hereto.

I solemnly swear under the penalties of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.



Pamela J. White, Bar No. 00181

Dated: April 19, 2004

Pamela J. White

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Pamela J. White
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Ober, Kaler, Grimes & Shriver,
A Professional Corporation
120 East Baltimore Street
Baltimore, Maryland 21202-1643
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AREAS OF EMPHASIS

Civil, commercial litigation, with emphasis on defense of employers and pursuit of claims of executives as to matters of wrongful discharge, express and implied contracts, unlawful discrimination, sexual harassment, defamation, invasion of privacy, implied covenants, express and restrictive covenants against competition, disputed compensation, various business torts; collective bargaining and labor arbitration for employers.

Successful trials, jury and non-jury, in employment, commercial, product liability, admiralty cases; successful resolutions in administrative proceedings, to resolve claims of discrimination, sexual harassment, constructive and wrongful discharge, equal pay violations, wage and hour violations, benefits and FMLA coverage disputes, disability discrimination, fraud and misrepresentation claims.

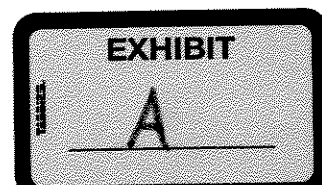
Counsel in general business and employment matters for litigation avoidance, alternative dispute resolution, employment policy review and revisions, claims administration and negotiation, contract negotiations and terminations, employment discharges and unemployment claims, leave policies, records retention, affirmative action requirements, drug and other personnel policies and practices.

Arbitrator and Mediator, Employment and Commercial panels of the American Arbitration Association; designated for Large Complex Case Panel by AAA.

Chair, Ober|Kaler Employment Law Group; seminar and employment course instructor, author.

ADMITTED TO PRACTICE

Maryland Court of Appeals
District of Columbia Court of Appeals
New York Supreme Court, Appellate Division
United States District Courts for the District of Maryland,
District of Columbia, and Southern District of New York
United States Courts of Appeals for the Second, Fourth, Ninth, and
District of Columbia Circuits
United States Claims Court
United States Supreme Court



Pamela J. White

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EDUCATION

J.D., Washington and Lee University School of Law, 1977
Law Review, 1975-77; Law News Editor, 1976-77
Law Council, 1983-87 (Emeritus, 1988-91), Law Council President, 1991-92 (Past President, 1992-93)
Distinguished Alumnus Award 1994
Honorary Member Order of the Coif, 1994
University Board of Trustees, 1995-2004
B.A., Mary Washington College, 1974
Distinguished Alumna Award, 2001
Phi Beta Kappa Honorary Member 2002

PROFESSIONAL ORGANIZATIONS, OFFICES

Maryland State Bar Association

President, 2001-2002 (President-Elect, 2000-2001; Immediate Past President, 2002-2003)
Board of Governors, 1993-1995, 1998-2003; Executive Committee, 1994-1995, 1999-2002
Section on Legal Education and Admissions to the Bar
(Council 1987-1996; Vice-Chair, 1991-1992; Chair, 1992-1993; Past-Chair, 1993-1994)
Professionalism Committee, 1992-1994, 1998-2000, 2002-2004; Chair, 1994-1997
Task Force on Professionalism, 1996-1997 (Co-Chair)
Special Committee on Prevention of Sexual Harassment, 1993-1996
Special Committee on Defense of Legal Services Corporation, 1995-1996
Select [Bench-Bar] Committee on Gender Equality, 1989-2000, 2002-2003, Chair 1997-1999
Litigation Section
ADR Section
Labor and Employment Section (Council Member, 1992-1996)
Planning Conference, 1999, 2000
MICPEL's Executive Director Search Committee 1999
Mentoring Committee, 1999

Women's Bar Association of Maryland

President, 1989-1990
Board of Directors, 1984-1986
Treasurer, 1986-1987, Vice-President, 1987-1988, President-Elect, 1988-1989
Immediate Past President, 1990-1991
Nominating Committee, 1992
State Bar Program, 1993;
Certificate of Appreciation, 1998
MSBA Liason, 2002-2004

Pamela J. White

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American Bar Association

Member, House of Delegates, 2000-2002

Sections on Litigation, Labor/Employment, Legal Education,
and Tort and Insurance Practice (Chair, Employer/Employee Relations

Committee, 1999-2000; Vice-Chair, 1990-1998, 2001-2004; Newsletter Editor, 1997-1998;
Chair-Elect, 1998-1999; Ethics, 1994-1995)

National Conference of Lawyers & Corporate Fiduciaries, 1991-1994

National Conference of Bar Presidents, 1989-90, 2000-02

Maryland Association of Defense Trial Counsel

Federal Bar Association, Maryland Chapter

District of Columbia Bar Association

Bar Association of Baltimore City

Executive Council, 1995-1996, 1997-1998

Public Education Committee, 1982-1986

Gender Bias Committee, 1990-1991, 1991-1992

Minority and Specialty Bar Relations, 1991-1992

Nominating Committee, 1991, 1992, 2003

Lawyer Employment Program, 1991-1992

Gender Issues Committee, 1992-1993, 1993-1994, 1994-1995

Dorsey Award Committee

OTHER PROFESSIONAL ACTIVITIES AND AWARDS

Maryland's Top 100 Women, May 2004, March 2000, The Daily Record

Public Trust and Confidence Committee of the Maryland Judiciary, 2001-2004

Special [Bench-Bar] Committee on "Ethics 2000", 2002-2003

MLAN Evaluation Committee (Maryland Legal Assistance Network), 2003-2004

Advisory Committee, 16th Annual Lawyers' Campaign Against Hunger, 2003

Leaders for Equal Justice Award, Pro Bono Resource Center, June 2002

Executive Director Award for Exemplary Service, Legal Aid Bureau, Inc., May 2002

Baltimore City Historical Society Board of Trustees, 2002-2004

Leadership in Law Award, The Daily Record, 2001

Rita C. Davidson Award, Women's Bar Association of Maryland, 2000

MACRO Advisory Board, Mediation and Conflict Resolution Center of the Judiciary, 2001-02

Equal Justice Council, Legal Aid Bureau, Inc. 2000-2004

Board of Directors, Pro Bono Resource Center of Maryland, 2000-2003

(Certificate of Appreciation for dedication and commitment, May 21, 2003)

MICPEL Faculty, The Maryland Institute for Continuing Professional Education
of Lawyers, Inc. (Executive Committee 2000-2002)

March 1996, Professional Legal Excellence Award for the Advancement of Professional
Competence, Maryland Bar Foundation

Maryland State Board of Law Examiners, 1986-1994

Pamela J. White

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Federal District Court Bicentennial Committee, 1988-1990
Federal District Court Advisory Group, Civil Justice Reform Act of 1990, 1991-1994
Volunteer Professional, Governor's Drug-Free Workplace Initiative, 1990-1994
Member, Board of Directors, National Conference of Women's Bar Associations, 1990-1991
Conference on Minorities in the Legal Profession, 1987
Fellow, American Bar Foundation, 1990 (Life Fellow)
Fellow, Maryland Bar Foundation, 1990, Board of Directors, 2000-2004
Fellow, Baltimore Bar Foundation, 1998
Platelets Donor, Hemapheresis Treatment Center, Johns Hopkins Hospital, 1980-1993
Phi Alpha Delta (legal fraternity)
Committee to Re-Elect Sitting Judges, Circuit Court for Baltimore City 1993-1994, 1995-1996, 1997-1998, 2001-2002
Serjeants Inn Law Club; Rule Day Club (Secretary 1999); Wednesday Law Club
New York State Bar Association (until 2003)

RECENT PRESENTATIONS, ARTICLES AND SEMINARS

May 4, 2004, Maryland's Top 100 Women for 2004, The Daily Record

April 16, 2004, "Civility and Civil Practice", PR, Pedagogy, and Civility Wars: Where to from Here?, Washington College of Law, American University

April 15, 2004, "The Legacy of Margaret Brent: Great Expectations and Practical Realities for Women in Law", Women's History Banquet, University of Baltimore School of Law, Women's Bar Association

March 19, 2004, presented seminar on "Arbitration Award Writing" for American Arbitration Association (AAA) at Washington, D.C.

March 8, 2004, faculty/critiquer, Civil Mediation Training, MICPEL, Baltimore

February 27, 2004, quoted in "Taking it to court: Spurned CEOs want more than the old 'handshake agreement'", by Rachel Sams, Baltimore Business Journal

February 15, 2004, "Maryland Bar Foundation Shea Award Presentation", Maryland State Bar Bulletin

February 10, 2004, "Proposed Ethics Rule 8.4(e): Fair and Honorable Conduct or Infringement of Free Speech?", Rule Day Law Club, Baltimore

Winter 2003/2004, "Discriminatory Conduct as Sanctionable Lawyer Misconduct", MSBA Section of Labor and Employment Law Newsletter.

Pamela J. White

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December 12, 2003, interviewed in "A Civil Debate", Maryland Daily Record (Maryland Law Section, by Ann W. Parks)

December 6, 2003, "The Law is a Noble and Learned Profession", Keynote remarks at Professionalism Course for new admittees to the Maryland Bar

Fall/Winter 2003, "Security Issues for Long Term Care Providers", Ober/Kaler Health Law Alert.

November 8, 2003, presented, "Sex, Drugs & Rock-n-Roll", Professional Grounds Management Society, Green Industry Expo, St. Louis, MO

November 5, 2003, presented "Discrimination and Lawyers' Ethics", Proposed Rule 8.4(e): A Speech Code for Maryland Lawyers?, The Federalist Society (Chesapeake Lawyers Chapter), Baltimore, Maryland

October 14, 2003, Faculty/Critique, 40-Hour Mediation Training Program, MICPEL, Baltimore

October 2-3, 2003, Litigating Employment Cases: Views From the Bench, "Initial Stages of Litigation", Georgetown University Law Center CLE, Washington, DC

September 20, 2003, Remarks on Volunteerism, Washington and Lee University Law Council, Lexington, Virginia

September 2, 2003, "The Qualities of Judicial Excellence", Panelist, Orientation Program of the Governor's Judicial Nominating Commissions, Annapolis, Maryland

September/October 2003, "Holistic Approach to Professionalism", Maryland Bar Journal, Vol. XXXVI, No. 5

Summer, 2003, "Professionalism: A View from the Bar", The Baltimore Lawyer, Vol. 6, No. 1

August 15, 2003, "Margaret Brent: A Professional", Bar Bulletin (Maryland State Bar Association Newsletter)

June 12, 2003, Remarks on Presentation of Edward F. Shea Professionalism Award, Maryland Bar Foundation, Ocean City, Maryland

May 31, 2003, Faculty, Lawyer and Client Relationships, Rule 11 Professionalism Course, Baltimore (MSBA)

May 21, 2003, Remarks, Equal Justice Council Sixth Annual Awards & Recognition Breakfast, Camden Yards, Baltimore

Pamela J. White

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May 2, 2003, presented "Investigation and Prevention of Same Sex Harassment Claims," Defense Research Institute (DRI) Employment Law Conference, Washington, D.C.

May 1 - 2, 2003, attended Employment Law Conference, Defense Research Institute (DRI), Washington, D.C. (12 hours CLE)

April 15, 2003, "Responsibilities of Lawyers to Others Within the Firm", Professional Responsibility Course, University of Baltimore School of Law

April 7, 2003, quoted in "Work Life During Wartime: Tensions, Anxiety, Risks of Discrimination Invade the Workplace", by Simon Nadel, BNA Human Resources Report

March 26, 2003, "Employment Law Update: Are There Workplace Tort Claims Lurking In Your Law Office?", Milton Talkin Lecture Series, Bar Association of Baltimore City (BABC)

March 25, 2003, presented "Professional Legal Excellence Award for the Advancement of Public Service Responsibility" to Jervis S. Finney, Maryland Bar Foundation, State House, Annapolis

March 19, 2003, "Lawyers, Sex and Legal Ethics", The Wednesday Club, Baltimore

March 4, 2003, Faculty/Critique, Mediation Skills Workshop, Baltimore (MICPEL)

February 24, 2003, "Ethics Update: How the MSBA Member is Affected by the Revised Rules of Professional Conduct" MSBA Mid-Year Meeting, Playa del Carmen, Mexico

February 24-25, 2003, attended "Multi-Disciplinary Practice: What's Happening"; "Effective District Court Practice"; (5 hours CLE), MSBA Mid-Year Meeting, Mexico

January-February, 2003, quoted in "Maryland faces new pro bono rules", Bar Leader (ABA)

January 5, 2003, Faculty Reviewer, Direct and Cross Examination, Maryland Trial Advocacy Institute, Baltimore (MICPEL)

2003, Contributing Author, Risk Management Handbook For Health Care Organizations (Fourth Edition), Chapter on Human Resources Issues, American Society for Healthcare Risk Management (ASHRM) of the American Hospital Association

December 9, November 4, 2002, Faculty, Annual Arbitrator Update, American Arbitration Association, Washington D.C.

December 6, 2002, Remarks, Rule 11/MSBA Professionalism Course for Admittees to the Maryland Bar, Baltimore

Pamela J. White

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November 27, 2002, Remarks on the presentation of Charles H. Dorsey, Jr. Mentor Award to E. Clinton Bamberger, Jr., Past Presidents' Luncheon, Bar Association of Baltimore City

November 2, 2002, Faculty, 25th Annual Legal Ethics Institute, Washington and Lee University, Lexington, Virginia

November 1, 2002, Remarks, Women Law Students Organization, Washington and Lee University School of Law, Lexington, Virginia

October 31, 2002, Faculty, "Zero Tolerance for Ethics and Fiduciary Breaches While Balancing Privacy and Confidentiality Concerns"; Remarks, "Legal Updates"; Sponsor, Chesapeake Human Resources Association (CHRA) Fall Meeting: "HR Caldron: Legal, Benefits & Compensation Issues That Won't Leave You Howling at the Moon!"

October 18, 2002, attended Third Biennial Bench-Bar Conference of the United States District Court for the District of Maryland

October 17, 2002, Faculty, Mediation Skills Workshop, MICPEL, Baltimore

October 15, 2002, "Supreme Court Ruling Affects Judicial Elections", MSBA Bar Bulletin

August 28, 2002, attended "Maryland and Federal Evidence", MICPEL 5.5 CLE hours, Baltimore

August 22-23, 2002, attended American Arbitration Association mandatory training: "Arbitrator II Advanced Case Management Issues", 12 CLE hours, Philadelphia

August 10, 2002, attended "To Catch a Thief", ABA Annual Meeting program by Tort and Insurance Practice Section (TIPS) Employer-Employee Relations Committee, 3.5 CLE hours

August 9, 2002, presented "Legal Education—A Tripartite Affair", Remarks on Professionalism Initiatives of the Organized Bar, National Conference of Bar Presidents, Washington, D.C.

August 9, 2002, attended "The Supreme Court Speaks—Can Judicial Candidates?", ABA Standing Committee on Judicial Independence", 2.5 CLE hours

August 5, 2002, Remarks on the Investiture of Halee Weinstein to the District Court of Maryland for Baltimore City

July 15, 2002, quoted in Maryland State Bar Association Bar Bulletin, "Moser Honored with Esteemed ABA Award"

July 15, 2002, "White Honored with Legal Aid Award" by Janet Stidman Eveleth, Maryland State Bar Bulletin

Pamela J. White

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June 18, 2002, quoted in "Legal services, honors take center stage at MSBA closing ceremony," by Earl Kelly, Maryland, The Daily Record

June 15, 2002, Remarks on Presentation of Annual Anselm Sodaro Judicial Civility Award to Judge Albert Matricianni, Jr., Maryland State Bar Association Annual Meeting

June 15, 2002, "Everything We Expected and More", Maryland State Bar Association Bar Bulletin

June 14, 2002, Remarks on Presentation of Edward F. Shea Award of Maryland Bar Foundation to Deborah Potter

May 20, 2002, "Resolving Workplace and Employment Disputes", workshop on Legal Perspectives on Using Mediation and Other Conflict Resolution Tools, Maryland Mediation and Conflict Resolution Office (MACRO)

May, 2002, quoted in "Legal Service Providers Brace for Hits," by Joe Surkiewicz, Maryland The Daily Record

April 19, 2002, quoted in "Judges, Lawyers, Bias and Harassment" by Joe Surkiewicz, Maryland The Daily Record

April 18, 2002, "Addressing Harassment and Bias by Adversaries and Judges," MICPEL Program on "Addressing Harassment, Bias, and Diversity in The Legal Profession", Baltimore

April 12, 2002, Welcoming remarks, National Bar Association Mid-Year meeting, Baltimore

April 7, 2002, Remarks on Honorable Conduct, Phi Beta Kappa Installation, Kappa Chapter, Mary Washington College, Fredericksburg, Virginia

April 6, 2002, quoted in "A Tale of Two Schools," by Joe Surkiewicz, Maryland, The Daily Record

March 27, 2002, quoted in "Foundation honors legal leaders, from newly minted to retired Judge," by Earl Kelly, The Daily Record

March 27, 2002, Remarks on Professionalism, Washington College of Law (First Years), American University, Washington, DC

March 26, 2002, Presentation of Maryland Bar Foundation Award to the Honorable Jamey Hochberg .Weitzman

March 19, 2002, WCBM Radio Show, sponsored by Cohen and Dwin

Pamela J. White

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March 15, 2002, "What IS It" . . . Maryland State Bar Association, Bar Bulletin

March 7, 2002, quoted in "Appeals Court Aims to Encourage Free Legal Help; Lawyers Would Report Pro Bono Work Yearly", *Washington Post*

February 25, 2002, quoted in "Four More Seats" The Daily Record

February 18, 2002, Remarks for Presidents' Holiday: George Washington and Honorable Conduct, MSBA Mid-Year Meeting, Las Vegas

January 28, 2002, Seminar on Professionalism, Asper Fellows, University of Maryland School of Law

January 20, 2002, comments in "Lawyers Run Risk of Getting Lobbyist Tag," *The Baltimore Sun*

January 2002, President's Bulletin on Public Ethics Lobbying Law, www.msba.org.

January/February, 2002, quotations in "Strides in Gender Equality" by Janet Stidman Eveleth, *Maryland Bar Journal*

January/February, 2002, "Legal Risks of Electronic Surveillance in the Workplace" by Stephen B. Stern with Pamela J. White, *Maryland Bar Journal*

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07/16/03	WHITE	Address discovery disputes and documents; letters from/to D. Landau	1.00
07/27/03	WHITE	Review discovery notes demanding production; draft letter re: Koch deposition; letter to client re:	2.50
08/15/03	WHITE	Address K. Koch discovery issues; review EEOC motion to compel	.30
08/10/03	WHITE	E-mail re: discovery issues	.20
08/11/03	WHITE	Address discovery issues	.40
08/19/03	BAILEY	Review Koch discovery requests, responses and correspondence issues for research; Motion to Compel; research regarding scope, temporal issues of document requests	2.30
08/19/03	BAILEY	Begin drafting Motion to Compel/research for document requests; read and review status memo and recent correspondence	1.80
08/20/03	BAILEY	Draft Motion to Compel document production and interrogatories	5.60
08/20/03	BAILEY	Research	1.30
08/21/03	BAILEY	Draft/revise Motion to Compel; review case law, relevant documents and EEOC Motion; edit Motion, confer with P. White regarding Motion	5.90
08/22/03	BAILEY	Prepare Motion to Compel and Notice of Service; confer with P. White regarding deposition and files; notes regarding witness	.70
08/30/03	WHITE	Research, prepare and edit Motion to Compel	5.00
09/02/03	BAILEY	Confer with Pamela J. White regarding _____ deposition and Motion to Compel; notes regarding document spoliation	.30
09/03/03	BAILEY	Review/revise Motion to Compel/draft letter to Gollin regarding Motion and discovery; review notes from Pamela J. White meeting	1.80
09/04/03	WHITE	Drafting	.20
09/04/03	BAILEY	Research _____ issues; review and revise Motion to Compel	3.40
09/05/03	WHITE	Edit Motion to Compel	1.50
09/05/03	WHITE	E-mail D. Landau; edit letter and draft Motion to Compel	.80
09/09/03	WHITE	E-mail re: Motion to Compel	.20
09/15/03	WHITE	Edit Motion to Compel; identify exhibits	3.00
09/30/03	BAILEY	Confer with Pamela J. White	.20

EXHIBIT

B

Kathy C. Koch

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		regarding Motion to Compel and discovery	
09/30/03	BAILEY	Review recent discovery correspondence and Motion to Compel	.60
10/01/03	BAILEY	Confer with Pamela J. White regarding outstanding discovery and Motion to Compel	.10
10/01/03	BAILEY	Conference call with Gollin regarding discovery	1.30
10/02/03	BAILEY	Evaluate discovery conference call for motion	.30
10/27/03	WHITE	Telephone call D. Gollin re: responses due to Motion to Compel	.20
10/28/03	WHITE	E-mail re: discovery disputes	.20
10/28/03	BAILEY	Receive supplemental discovery/e-mail from Pamela J. White	.20
11/03/03	WHITE	Telephone calls D. Gollin and C. Bailey re: motion to compel	1.20
11/04/03	BAILEY	Review L.A. documents and deposition transcripts; formulate timeline for Pamela J. White regarding Koch	2.00
11/07/03	BAILEY	Voicemail message from Pamela J. White regarding _____ deposition and Motion to Compel; confer with her regarding same	.40
11/14/03	BAILEY	Receive/review opposition to Motion to Compel; pull cases in opposition	.70
11/17/03	BAILEY	Confer with Pamela J. White regarding Reply to Motion to Compel documents for Koch	.20
11/17/03	BAILEY	Confer with Pamela J. White regarding Reply to Motion to Compel, notes to file	.50
11/17/03	BAILEY	Confer with Pat Banister regarding e-filing motion to compel	.10
11/17/03	BAILEY	Return call to opposing counsel regarding filing and schedule	.10
11/21/03	WHITE	Secure extension re: Motion to Compel	.10
12/01/03	BAILEY	Organize documents and pleadings for Reply to Motion to Compel and Good Faith Certificate	.20
12/02/03	BAILEY	Document review and index for chronology of document production compel with C. Bailey	.10
12/04/03	BAILEY	Draft Reply to Motion to Compel; review caselaw and document production	4.30
12/05/03	BAILEY	Research case law and draft reply, edit	1.40
12/08/03	WHITE	Research and draft statement of facts for reply memorandum	2.00
12/10/03	BAILEY	Review attorney/client and WP issues; research caselaw; review title VII issues and research case	1.40

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		law	
12/17/03	BAILEY	Review notes/cases for reply to motion to compel; research Title VII investigating and record keeping obligations	.90
12/18/03	BAILEY	Draft revised Reply to Motion to Compel; confer with Pamela J. White regarding extension of time; review correspondence regarding same	1.50
12/22/03	BAILEY	Organize notes/research for reply	.20
12/29/03	BAILEY	Review and revise Reply to Motion to Compel; read and insert caselaw	2.60
12/29/03	BAILEY	Revise Reply memo regarding sanctions; confer with Pamela J. White regarding same	.60
01/02/04	WHITE	Work on chronology of production for reply memorandum	1.50
01/06/04	WHITE	Work on reply memo	1.50
01/09/04	WHITE	Pull reply memorandum together and edits for Koch review	3.80
01/09/04	BAILEY	Confer with Pamela J. White regarding Reply Brief; telephone call to Gollin regarding same	.10
01/12/04	WHITE	Addition to reply memo; review <u>deposition</u>	4.00
01/12/04	WHITE	Final edits to memo	2.60
01/13/04	BAILEY	Confer with Pat Banister regarding Notice of filing Reply Brief	.10
01/13/04	BANISTER	Prepare and dispatch Notice and Reply Memo to Motion to Compel for e-filing; discuss with Ms. Bailey	1.10
01/20/04	BAILEY	Telephone call with Gollin regarding Motion to Compel; confer with Pamela J. White regarding same	.20
01/20/04	BAILEY	Review status of discovery for purposes of Motion to Compel; prepare for call with D. Gollin regarding same	1.10
01/20/04	BAILEY	Telephone call from D.Gollin regarding discovery	.10
01/20/04	WHITE	Telephone calls D. Gollin re: Motion to Compel	.30
01/21/04	BAILEY	Telephone call with D.Gollin regarding Motion to Compel and Reply	.90
01/22/04	BAILEY	Review notes regarding discovery/Motion to Compel; call with opposing counsel; review letter to LA regarding conference documents; voicemail message for Pamela J. White regarding both	.30
01/22/04	BAILEY	Telephone call to D. Gollin regarding documents	.10
01/23/04	BAILEY	Review/revise notes from telephone call with D. Gollin regarding discovery disputes; review reply	.80

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		and case law regarding other complaints of decision	
01/27/04	WHITE	Prepare and conduct teleconference on Motion to Compel with D. Landau	1.30
01/27/04	BAILEY	Prepare for and conference call with opposing counsel regarding Motion to Compel/discovery matters; supplemental answers	.90
02/16/04	BAILEY	Review status of Motion to Compel; filing requirements; review rules; draft 104.7 certificate	.70
02/20/04	BAILEY	Review/revise 104.7 Certificate; good faith for Motion to Compel	.30
02/21/04	WHITE	Address spoliation questions	.40
02/23/04	WHITE	Telephone call D. Gollin re: Motion to Compel	.10
02/24/04	WHITE	Draft certificate for Motion to Compel	.50
02/25/04	BANISTER	Prepare and dispatch for e-filing Motion to Compel	.40
02/26/04	WHITE	File Motion to Compel	.10
03/21/04	WHITE	Receive, review letter from D. Gollin on discovery; pull documents for hearing	1.20
03/22/04	WHITE	Review documents; prepare for hearing before Judge Quarles	1.60
03/22/04	BAILEY	Receive/review supplemental discovery responses	.30
03/22/04	BAILEY	Confer with Pamela J. White regarding supplemental answers and hearing preparation; pull documents for hearing	.30
03/23/04	WHITE	Prepare for hearing	1.50
03/24/04	WHITE	Prepare, attend and conduct argument at hearing before Judge Quarles	2.90
03/24/04	BAILEY	Aid in hearing preparation	.30
03/25/04	BAILEY	Receive/review order for Discovery Dispute to Magistrate Judge	.10
04/07/04	BAILEY	Confer with Pamela J. White regarding Judge Grimm Discovery opinion	.10
04/07/04	BAILEY	Read/review Grimm Discovery opinion; meet with Pamela J. White regarding same; contemplate attorney's fee petition	.60